

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	
Adoption of report concerning the 2009)	11-0512
reliability performance of)	
Commonwealth Edison Company)	
pursuant to 83 Ill. Adm. Code 411.140)	

**RESPONSE OF COMMONWEALTH EDISON COMPANY TO
“ILLINOIS COMMERCE COMMISSION ASSESSMENT OF
COMMONWEALTH EDISON COMPANY RELIABILITY REPORT AND
RELIABILITY PERFORMANCE FOR CALENDAR YEAR 2009”**

Commonwealth Edison Company (“ComEd”), submits this response to the report of the Commission Staff dated December 31, 2010, and entitled “Illinois Commerce Commission Assessment of Commonwealth Edison Company Reliability Report and Reliability Performance for Calendar Year 2009”.

ComEd would like to thank Staff for providing this assessment of its 2009 Annual Reliability Report. ComEd values Staff’s assessment and would like to take this opportunity to respond to the recommendations made by Staff.

ComEd experienced seven storms in 2009, which is fewer than the 1998 - 2008 mean of eleven storms per year. ComEd took full advantage of the milder weather to complete reliability improvements that made a positive impact in 2009 and beyond.

Following is ComEd’s response to Staff’s recommendations which are listed on page 38 of the assessment report, and are restated below in bold text:

ComEd continue its focus on improving customer service overall while directing additional attention on better communicating the need for tree trimming to customers. (Section 7)

ComEd investigate the problem areas and modify programs to advance and maintain a four-year (minimum) tree trimming cycle throughout its service territory that is in compliance with Admin Code Part 305.20. (Section 7)

ComEd investigate more ways to address problem trees. (Section 7)

ComEd pursue more opportunities to educate customers on the reliability consequences of planting some types of vegetation beneath or near ComEd's distribution equipment. (Section 7)

ComEd's distribution Vegetation Management department has accomplished a significant reduction in the number of customer refusals. Each refusal completed represents trees that no longer put the electric distribution system at risk. At the end of 2002, there were 516 open customer refusals pending and an additional 1,653 new refusals were encountered through 2010. A total of 2,158 refusals have been resolved since 2002 with only 11 remaining open at end of 2010. New customer refusals in 2010 were the lowest on record, with 47 new refusals documented. The completion of backlogged refusals and the reduction in new refusals can be attributed to improved teamwork to develop satisfactory resolutions, and improved communication tools to use with customers.

(Source: 2010 Annual Reliability Report, Section G, pgs G-6)

ComEd's transmission Vegetation Management department has maintained several process improvements initiated in 2009. Staffing increased to provide greater oversight of program. Work planning and quality assurance (QA) is managed span-by-span with GPS. All work, including planning, trimming through completion of QA is collected and tracked electronically with work planning software. There were no transmission vegetation related outages in 2010.

(Source: 2010 Annual Reliability Report, Section G, pgs G-6)

ComEd has initiatives in place to improve customer satisfaction related to vegetation management. For example, ComEd has reached out to municipalities to remove incompatible trees that have been repeatedly pruned for line clearance and replace with low-growing compatible trees. ComEd has also been educating communities about the importance of line clearance tree trimming and how it is performed through community meetings and outreach activities.

(Source: 2010 Annual Reliability Report, Section G, pgs G-6)

Furthermore, ComEd continues to work with customers and municipalities to promote planting "the right tree in the right place" to avoid future tree/utility conflicts Arbor Day activities supported by ComEd further this type of education to many groups and organizations throughout the service territory. In 2010, ComEd was named a Tree Line USA utility by the Arbor Day Foundation for the 11th time in recognition of its national

leadership in caring for and protecting our community's trees while meeting service objectives.

(Source: 2010 Annual Reliability Report, Section G, pgs G-6 -7)

To heighten the awareness of proper line clearances, External Affairs has completed outreach to ComEd service territory Councils of Government to mitigate line clearance violations. In addition, proper line clearance information will also be distributed to approximately 400 municipalities and Chicago wards by June 1, 2011 as part of the 2010 Annual Report summary meetings. The Annual Report provides a summary of system electric service performance to ComEd franchising municipalities, including the City of Chicago.

(Source: 2010 Annual Reliability Report, Introduction, pg 2)

ComEd work to explain further in future reports how savings maintenance expense as well as efforts to moderate the future growth of maintenance expense impacts current and future reliability performance. (Section 10)

ComEd's reliability improvement long-range plan is designed to improve system reliability performance. The investment plan is designed for the whole system, but also includes a focus on community specific areas of concern. This approach allows ComEd to evaluate its overall investments and customer impacts to ensure that such investments are the most effective. ComEd continues to increase efficiency by implementing process improvements such as increased utilization of internal resources, reduced outsourcing, renegotiated contractor and material costs, as well as use of a risk based decision-making process. These planning and process improvements enabled ComEd to plan and execute reliability improvement programs with equivalent benefits at lower costs.

(Source: 2010 ComEd Annual Reliability Report, Section A, pg A-2)

Dated: August 8, 2011

Respectfully Submitted,

/s/ Michael S. Pabian

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CERTIFICATE OF SERVICE

Commonwealth Edison is currently the only party to this proceeding and no other parties are listed by the Commission in the e-Docket file in this case.

/s/ Michael S. Pabian
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